

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	CASE NO: 2:20-cr-157 (2)
v.	:	
	:	CHIEF JUDGE MARBLEY
NICOLE H. GEORGES,	:	
	:	
Defendant.	:	

DEFENDANT’S PROPOSED EXHIBIT LIST

Now comes Defendant, Nicole Georges, by and through counsel, who hereby submit the following list of exhibits as intended to be introduced at trial presently set for June 21, 2021. Defense Counsel hereby reserves the right to supplement the exhibit list, as not all discovery, particularly in the form of Jencks material, has yet to be provided to Defense Counsel. Defense Counsel will send a courtesy copy of this list with the attached intended exhibits to the Assistant United States Attorney, Christopher Jason, Esquire, via email in preparation for the Final Pre-Trial hearing presently set for June 16, 2021.

EXHIBIT LIST

1. Insys Therapeutics, Inc Employment Offer Statement
2. Insys Therapeutics Speaker Agreement
3. Email from Alec Burlakoff on September 17, 2012, to Michael Babich and others
4. Email from Alec Burlakoff on September 17, 2012, to Michael Babich and others
5. TIRF REMS patient-prescriber agreement form
6. Open Payments Data from Dr. Kenneth Ecker
7. Speaker Program Bureau checklist
8. Evaluation Form
9. Insys Speaker Program Pre-Program checklist
10. (14) Speaker Program Attendee Sign in Forms, 9/11/15,
11. Plan 365, Project & Program Code for Speaker Program, 9/11/15
12. Carrabba’s Receipt
13. Transaction Details for Carrabbas

14. Email demonstrating receipts from Plan 365
15. Spreadsheet documenting food and beverage
16. Photo Array
17. Text messages from Tracey Couch
18. Picture from Cavs Game
19. Douglas Shrewsbury Guilty Plea to Aggravated Trafficking in Drugs, Aggravated Possession of Drugs, and Medicaid Fraud
20. Douglas Shrewsbury's Sentencing Memorandum
21. Douglas Shrewsbury's Sentencing Entry
22. Douglas Shrewsbury's Motion for Judicial Release
23. Tracey Couch Guilty Plea

Respectfully submitted,

/s/ Mark C. Collins

MARK C. COLLINS (0061207)

Mark C. Collins Co., L.P.A.

150 E. Mound St., Suite 308

Columbus, Ohio 43215

(614) 443-3100 (614) 413-3902-fax

mark@mcollinslaw.com

/s/ Kaitlyn C. Stephens

KAITLYN C. STEPHENS (0095589)

Mark C. Collins Co., L.P.A.

150 E. Mound St., Suite 308

Columbus, Ohio 43215

(614) 443-3100 (614) 413-3902 – Fax

kaitlyn@mcollinslaw.com

Attorneys for Defendant Nicole H. Georges

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2021 I electronically filed the Defendant's Proposed Exhibit List, using the CM/ECF System, which will send notification of such filing to the following: **Christopher Jason, Esq.**

/s/ Mark C. Collins

MARK C. COLLINS (0061207)

/s/ Kaitlyn C. Stephens

KAITLYN C. STEPHENS (0095589)